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Attorney for Defendant
Christian Anthony Romero

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

United States of America,

Plaintiff,

v.

Jose Guadalupe Lopez-Zamora,
Leonardo Flores Beltran,
Christian Anthony Romero,
Baudelio Vizcarra, Jr.,
Joaquin Alberto Sotelo Valdez,
Erika Gabriela Zamora Rojo,
Alejandro Tello,
Jose Luis Aguilar Saucedo, and
Rosario Zamora Rojo,

Defendants.

Case No.: 2:21-cr-00007-DAD

Hon. Dale A. Drozd

**MOTION SEEKING THE
APPOINTMENT OF A
COORDINATING DISCOVERY
ATTORNEY**

COMES NOW, the defendants, through their counsel of record,
individually and for the benefit of all court-appointed defendants and their counsel
and move this Court for an order under 18 U.S.C. § 3006A(b) appointing John C.
Ellis, Jr. as Coordinating Discovery Attorney (“CDA”).

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I. Basis for Motion to Appoint a Coordinating Discovery Attorney

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2 Nine individuals are charged in a fourteen-count indictment with offenses
3 relating to a conspiracy to distribute and possess with intent to distribute fentanyl,
4 cocaine, and methamphetamine.¹ Discovery includes reports, video footage, audio
5 recordings, and wiretap data, and location data.

6 The large volume and technical nature of discovery led defense counsel to
7 seek the assistance of John Ellis to serve as a Coordinating Discovery Attorney
8 (“CDA”). Mr. Ellis is one of five National Coordinating Discovery Attorneys under
9 contract with the Administrative Office of the U.S. Courts, Defender Services
10 Office (“DSO”). Under this program, DSO pays for the services of the CDA,
11 though some of his work requires the help of outside litigation support technology
12 companies, which must be funded by the Court. *See* Exhibit A (Administrative
13 Office of the United States Courts June 2019 Memorandum regarding managing
14 large volumes of discovery in CJA cases).

15 In this role, Mr. Ellis will advise counsel of the most efficient ways to
16 organize discovery and implement a discovery management plan. His work will
17 prevent duplicative time and reduce the costs incurred in organizing and searching
18 key documents. His responsibilities include:

- 19 • Managing and, unless otherwise agreed upon with the Government,
20 distributing discovery produced by the Government and relevant
21 third-party information common to defense counsel for all defendants;
- 22 • Evaluating the volume and type of discovery to determine what
23 technologies will ensure duplicative costs are avoided and the most
24 efficient and cost-effective methods are identified;
- 25
- 26

27
28 ¹ The government indicted fifteen individuals at the onset of this case although
currently nine defendants remain.

- Acting as a liaison with the United States Attorney's Office to ensure the timely and effective exchange of discovery;
- Identifying, evaluating, and engaging third-party vendors and other litigation support services;
- Assessing the needs of defense counsel and further identifying any additional vendor support that may be required—including copying, scanning, forensic imaging, data processing, data hosting, trial presentation, and other technology depending on the nature of the case;
- Identifying any additional human resources that may be needed by defense counsel for the organization and substantive review of information; and
- Providing training services to the defense teams as a group and individually.

Mr. Ellis has experience strategizing how best to organize multiple types of discovery formats while being mindful of maintaining evidentiary integrity. Based on Mr. Ellis' experience working on these types of cases, his work could save substantial time and costs in assessing and organizing the discovery, as opposed to all defense counsel and their staff learning about the tools to analyze such a large volume of materials. His work will not include representational services for any defendant.

II. Conclusion

For all the reasons set forth above, defense counsel respectfully requests this Court enter an order appointing John C. Ellis, Jr. as the Coordinating Discovery Attorney.

Respectfully submitted,

Dated: January 18, 2023

/s/ Kresta N. Daly

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